




Re: Thread Wallets LLC v. Brixley Bags, LLC [IMAN-DMS1.FID2327228]

From Bud Todd <btodd@kba.law>

Date Wed 12/11/2024 5:17 PM

To Brittany Frandsen <BFrandsen@WNLaw.com>

Cc Chad Pehrson <cpehrson@kba.law>; David P. Johnson <DJohnson@WNLaw.com>; Litigation Calendar <calendar@kba.law>

 1 attachment (209 KB)

BRIXLEY_006553.pdf;

Brittany,

Thank you for checking on those dates. January 2 works for Logan England's deposition, and the 20th at 9:00 AM for Ryan and 2:00 PM for McKenzie work for us. Do you know if Trevor Reese is available next week?

I have spoken to our clients about the week of January 13th. They will be traveling in the latter part of that week and would be available on the 13th or 14th. Would you be open to conducting Ethan's deposition remotely? As for continuing with Kimberly's deposition, we propose that the deposition be finished by written questions under FRCP 31. With regard to the 30(b)(6) deposition of Brixley, would you be able to provide us with the notice and the topics listed so that we can determine who to designate as the 30(b)(6) witness?

Finally, please see Brixley's updated sales figures attached.

Thank you,



Bryan (Bud) Todd
Associate

SALT LAKE CITY: 801.939.3698

btodd@kba.law

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From: Brittany Frandsen <BFrandsen@WNLaw.com>

Sent: Wednesday, December 11, 2024 4:32 PM

To: Bud Todd <btodd@kba.law>

Cc: Chad Pehrson <cpehrson@kba.law>; David P. Johnson <DJohnson@WNLaw.com>; Litigation Calendar <calendar@kba.law>

Subject: FW: Thread Wallets LLC v. Brixley Bags, LLC [IMAN-DMS1.FID2327228]

- EXTERNAL EMAIL -

Bud,

Ryan King is available for the noticed deposition date and time (the 20th at 9:00 AM). McKenzie Bauer is available on the 20th at 2:00 PM; please let me know if that works on your end.

Thank you,

Brittany Frandsen

Shareholder

WORKMAN NYDEGGER

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Office Direct: (801) 321-8827

Email: bfrandsen@wnlaw.com

From: Brittany Frandsen <BFrandsen@WNLaw.com>

Date: Tuesday, December 10, 2024 at 11:26 AM

To: Bud Todd <btodd@kba.law>, David P. Johnson <DJohnson@WNLaw.com>

Cc: Chad Pehrson <cpehrson@kba.law>, Litigation Calendar <calendar@kba.law>

Subject: Re: Thread Wallets LLC v. Brixley Bags, LLC [IMAN-DMS1.FID2327228]

Bud,

I've confirmed the noticed deposition date and time works for Colby Bauer.

Logan England is not available at his noticed time. Are you available for his deposition on January 2 at 9:00 AM?

I'm still working to confirm the others and will get back to you when I have more updates.

Brittany

Brittany Frandsen

Shareholder

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From: Bud Todd <btodd@kba.law>
Date: Friday, December 6, 2024 at 9:20 PM
To: Brittany Frandsen <BFrandsen@WNLaw.com>, David P. Johnson <DJohnson@WNLaw.com>
Cc: Chad Pehrson <cpehrson@kba.law>, Litigation Calendar <calendar@kba.law>
Subject: RE: Thread Wallets LLC v. Brixley Bags, LLC

Brittany and David,

Attached, please see our response to your letter dated November 25, 2024. On November 25, You wrote to us acknowledging receipt of our letter dated November 22, 2024, and indicated that you were preparing a response to that letter. We wanted to follow up to see when we can expect a response to that letter.

Additionally, we have attached notices of deposition for Colby Bauer, McKenzie Bauer, Dillon Boyes, Logan England, Ryan King, and Trevor Reese. Please let us know if the dates in the notices work for you and your clients. If those dates and times do not work, please propose other times your clients would be available.

Thank you



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